

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES  
OF AMERICA

V.

WALTER MAY,  
Defendant,

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CRIMINAL NO. 05-30023-MAP

MOTION FOR FURTHER DISCOVERY PER LOCAL RULE 116.1(D)

Now comes the defendant in the above-entitled indictment and requests this Honorable Court for the following further discovery regarding the Sri Lankan government agents, which the government has represented in their discovery disclosures will be used as witnesses if this case was to go to trial and information regarding any other confidential informants of which the government refused to supply.

1. A translated copy of all testimony of the Sri Lankan government agent either in Sri Lanka or the United States related to the indictment of the defendant in this case or the charges brought against the defendant in Sri Lanka.
2. A copy of all previously recorded testimony of this witness.
3. A history of this witnesses cooperation with the United States and any other governmental agency in which either he or the Sri Lankan government has received a reward or inducement.
4. A transcription of ALL tapes of ALL conversations of this witness.
5. The defendant requests that the Government preserve for trial any original notes taken by the Sri Lankan Police of any interviews with the defendant or any one else related to this case.

6. The defendant requests all translated reports and interviews taken by the Sri Lankan investigative agency and in particular with the agent or agents who will testify against the defendant in the above entitled matter.
7. The defendant requests that the Government provide defense with this material immediately so he can prepare for trial.
8. If any, the disclosure of confidential witnesses names and addresses pursuant to Roviaro v. United States, 353 U.S. 53 (1957).
9. The full record of arrests and convictions of any other cooperating witnesses including whether this witness is currently under investigation for any violations of state or federal law.
10. Any promises, rewards and or inducements of any kind.
11. The identities of all witnesses who have been offered immunity by the Government.
12. The record of any law enforcement agency, federal, state or local, which pertain to the criminal activity, arrest and/or conviction of any confidential informant.

WHEREFORE, the defendant prays that this Motion be granted and that disclosure pursuant to Local Rule 116.1(a)(7) be granted.

Respectfully submitted,

THE DEFENDANT

By: /s/ Alan J. Black  
ALAN JAY BLACK, His Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to Todd Newhouse, AUSA and Karen Goodwin, AUSA on this on this 16<sup>th</sup> day of January 2007.

/s/ Alan J. Black